## IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF PUERTO RICO

#### THE UNITED STATES OF AMERICA

v Case No.: 15-CR-712 (DRD)

LUIS GOMEZ-ARROYO (21)

# MOTION NOTIFYING BAIL VIOLATION AND REQUESTING AN ARREST WARRANT AND HEARING

TO THE HONORABLE DANIEL R. DOMÍNGUEZ UNITED STATES DISTRICT JUDGE DISTRICT OF PUERTO RICO

COMES NOW, MANUEL ROMÁN, UNITED STATES PROBATION OFFICER

OF THIS COURT, respectfully informing and requesting the following:

- 1. On November 25, 2015, defendant Luis Gomez-Arroyo was released on bail. Prior to the Order Setting Conditions of Release, defendant was ordered on September 23, 2015 by Judge Israel Hernández-González of the Humacao State Court to receive treatment because of his cocaine and heroin addiction. Since said date he had been receiving treatment at Hogar Crea in Fajardo. During a meeting with defendant on December 7, 2015 he was explained to notify immediately this writer if he needed additional services. Nevertheless, client's interest was to be discharged from treatment.
- 2. Mr. Luis Sosa, who is supervising defendant at the state level, informed that during a hearing at the Humacao State Court on December 29, 2015, client had also requested to be discharged from treatment; however, the Court did not grant defendant's request

relapse and abandoned the treatment program, Hogar Crea, in violation to bail condition 7(o), which required defendant to participate in a program of substance abuse

3. During the evening of January 19, 2016, defendant Luis Gomez-Arroyo had a

treatment. Presently, Mr. Gomez-Arroyo's whereabouts are unknown. He has not

contacted the U.S. Probation Office.

**WHEREFORE**, in view of the above-mentioned facts, the undersigned respectfully notifies the Court defendant's abandonment of treatment and requests an arrest warrant be issued for Mr. Gomez-Arroyo so that he may be brought to appear before this Honorable Court to show why his bail supervision should not be revoked.

In San Juan, Puerto Rico, this 21<sup>st</sup> day of January, 2016.

Respectfully submitted,

EUSTAQUIO BABILONIA, Chief U.S. Probation Officer

s/ Manuel Román

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### **CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that today, I electronically filed the foregoing with the Clerk of Court using the CM/ECF system, which will send notification of such filing to the interested parties in this case.

In San Juan, Puerto Rico, this 21<sup>st</sup> day of January, 2016.

Respectfully submitted

EUSTAQUIO BABILONIA, Chief U.S. Probation Officer

#### s/ Manuel Román

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